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June 21, 2023

Honorable Lee G. Dunst  
United States District Court  
Eastern District of New York  
100 Federal Plaza, Courtroom 830  
Central Islip, New York 11722

**Re: Hasper v. County of Nassau, et al.**  
**Docket No.: 20-cv-2349-WFK-LGD**

Dear Judge Dunst:

As you know, Mirel Fisch and I represent the Plaintiff, William Hasper, in the above-referenced matter. On June 14, 2023, Your Honor issued an electronic scheduling Order directing the parties to submit a proposed discovery timeline for the completion of discovery, along with a proposed discovery Order by Plaintiff compelling the production of outstanding discovery, indicating whether Defendants consent to the proposed Order.

Given the status of discovery, the parties propose the following timeline for the completion of discovery:

**PHASE 2 DISCOVERY**

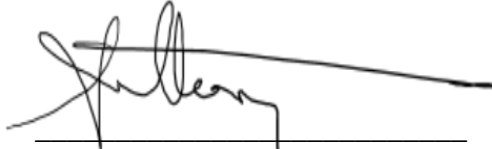
1. **Deadline** for proposed **amendment of the pleadings** to add claims or join additional parties: November 15, 2023.
2. Anticipated **number of depositions**: Plaintiff: 12; Defendants: 1.
3. Date for **completion of fact discovery**: July 1, 2024.
4. **Number of expert witnesses**: Plaintiff: 1; Defendants: 2.
5. Date for exchange of **expert report(s)**: August 15, 2024.
6. Date for **completion of expert discovery**: October 15, 2024.
7. Date for **submission of joint certification of completion of all discovery**: October 30, 2024.

8. Final date to take the first step in **dispositive motion practice**: November 14, 2024.  
(*Parties are directed to consult the District Judge's Individual Rules regarding such motion practice*).

With respect to the portion of your Honor's Order directing Plaintiff to submit a proposed discovery Order and advising whether Defendants consent to that proposed Order, the parties are requesting a 7-day extension for that submission. The reason for the adjournment request is that yesterday, Mirel and I were advised by Mr. Reissman that he is no longer assigned to this case and that the case was reassigned to Deputy County Attorney Brian McLaughlin. Mirel and I spoke to Brian for the first time yesterday afternoon, and sent him our proposed Order. Mr. McLaughlin advised that he needed to confer with Mr. Reissman regarding the outstanding discovery, and then emailed us objections to some of the discovery requests. Unfortunately, based upon conflicting schedules today we cannot meet and confer today.

Accordingly, the parties are jointly requesting an additional week for the submission of Plaintiff's proposed discovery Order, so that we can discuss the issues in an attempt to eliminate or reduce the new objections.

Respectfully submitted,



Anthony M. Grandinette

AMG/mk